REMARKS

Applicants thank the Office for its participation in a telephonic interview with the undersigned on Tuesday, May 14 to discuss this application. In response to the above-identified Office Action, Applicants have amended claims 27, 40, 52 and 64-66, canceled claims 38, 50 and 62, and added claims 67-85 as explained further herein below. Support for these amendments and added claims can be found at page 6, lines 17-20; page 9, lines 6-13; and page 11, lines 18-21 through page 12, line 17 in the above-identified application. Accordingly, Applicants submit no new matter has been added by way of these amendments. In view of these above amendments and the following remarks, Applicants hereby request further examination and reconsideration of the application, and allowance of claims 27-37, 39-49, 51-61 and 63-85.

The Office has rejected claims 27-28, 30-32, 39-41, 43-44, 51-53, 55-56 and 63-66 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Number 6,033,226 to Bullen ("Bullen"), and claims 29, 33-37, 42, 54 and 57-61 under 35 U.S.C. § 103(a) as being unpatentable over Bullen. The Office asserts that Bullen discloses a system (FIGS. 1A-1B) and a method (FIG. 2) for training a user to operate a set of one or more devices 9 (col. 3, line 57 through col. 4, line 11). The Office has also rejected claims 27-28, 32, 36-37, 39, 52-53, 60-61 and 63 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Number 6,193,519 to Eggert et al. ("Eggert"). The Office asserts that Eggert discloses a system (FIG. 1) and a method (abstract) for training a user to operate a set of one or more devices (col. 4, lines 4-15; col. 4, lines 46-51; and col. 5, lines 8-18).

Applicants appreciate the Office's indication that claims 38, 50 and 62 recite allowable subject matter. In response, Applicants have amended claims 27, 40 and 52 so as to further recite "reassign[ing] at least one device from a second set of one or more devices to a first set of one or more devices ..." as shown herein. As such, Applicants respectfully submit that claims 27, 40 and 52 have been amended to more clearly define the claimed invention and emphasize the distinction over the cited art as noted by the Office. In view of the foregoing amendments and remarks, the Office is respectfully requested to reconsider and withdraw the rejections of claims 27, 40 and 52. Since claims 28-37, 39 and 64 depend from, either directly or indirectly, and contain the limitations of claim 27, claims 41-49, 51 and 65 depend from, either directly or indirectly, and contain the limitations of claim 40, and claims

53-61, 63 and 66 depend from, either directly or indirectly, and contain the limitations of claim 52, they are patentable in the same manner as claims 27, 40 and 52.

Applicants submit claims 67-85 are distinguishable over the cited references and are patentable in the same manner as claims 27-37, 39-49, 51-61 and 63-66.

In accordance with 37 CFR § 1.121, attached hereto is a marked-up copy of the changes made to the claims by the current amendment. The version with markings to show changes made is located in the attached Appendix A.

In view of all of the foregoing, it is submitted that this case is in condition for allowance and such allowance is earnestly solicited. In the event that there are any outstanding matters remaining in the above-identified application, the Office is invited to contact the undersigned to discuss this application.

Respectfully submitted,

Date: June 11, 2002

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APPENDIX A

Version With Markings to Show Changes Made

In reference to the amendments made herein to claims 27, 40, 52 and 64-66, additions appear as underlined text while deletions appear as bracketed text and added claims 67-85 are enclosed with double dashes, as indicated below:

IN THE CLAIMS:

Claims 38, 50 and 62 have been cancelled.

Claims 27, 40, 52 and 64-66 have been amended as follows:

27. (Twice Amended) A method for training a user, the method comprising:

receiving control information having at least one training instruction regarding at least one task to be performed as part of a training exercise;

reassigning at least one device from a second set of one or more devices to a first set of one or more devices based upon requirements of the training exercise;

managing a set of devices in the first set required to perform the training exercise; and

directing one or more of the required devices to execute the at least one training instruction.

40. (Thrice Amended) A system for training users, the system comprising:

a device controller connected to [a] one or more client [computer] machines via a network, the device controller receiving control information from the one or more client [computer] machines, the control information having at least one training instruction regarding at least one task to be performed as part of a training exercise; [and]

an infrastructure control module that reassigns at least one device from a second set of one or more devices to a first set of one or more devices based upon requirements of the training exercise; and

a control system that manages a set of devices in the first set required to perform the training exercise, the control system directing the one or more required devices to execute the at least one training instruction.

52. (Thrice Amended) A system for training users, the system comprising:

a device controller including:

receiving means for receiving control information, the control information having at least one training instruction from [a] one or more client [computer] machines regarding at least one task to be performed as part of a training exercise; [and]

reassigning means for reassigning at least one device from a second set of one or more devices to a first set of one or more devices based upon requirements of the training exercise; and

control means for managing a set of devices in the first set required to perform the training exercise, the control means directing the one or more required devices to execute the at least one training instruction.

64. (Amended) The method of claim 27, wherein the control information received at the device controller is in a first network protocol, further comprising [the step of]:

the device controller translating the control information from the first network protocol to a second network protocol prior to transmitting the control information.

65. (Amended) The system of claim 40, wherein the control information received at the device controller is in a first [format] network protocol, and wherein the device controller is further capable of translating the control information from the first network protocol to a second network protocol prior to transmitting the control information.

66. (Amended) The system of claim 52, wherein the device controller further includes:

means for translating the control information from a first network protocol to a second network protocol prior to transmitting the control information.

Claims 67-85 have been added as follows:

--67. (New) A system comprising:

a control system that receives control information having at least one training instruction regarding at least one task to be performed as part of a training exercise, the control system managing one or more devices in a first set of one or more devices which are

required to perform the training exercise, the control system directing a set of the one or more required devices to execute the at least one training instruction; and

an infrastructure control module that reassigns at least one device from a second set of one or more devices to the set of one or more required devices based upon requirements of the training exercise. --

--68. (New) The system of claim 67 wherein the control system enables one or more client machines sending the control information to remotely access the set of the one or more required devices to perform the training exercise on the set of the one or more required devices. --

--69. (New) The system of claim 67 further comprising a user communication module that translates the received control information from a first network protocol understood by one or more client machines to a second protocol understood by the set of one or more required devices. --

--70. (New) The system of claim 67 wherein the control system receives exercise start information from one or more client machines, the exercise start information reflecting a request from the one or more client machines that the training exercise begin, the control system determining initialization information based upon the received exercise start information, the control system initializing the set of one or more required devices in accordance with the initialization information. --

--71. (New) The system of claim 70 further comprising a firewall established between a network and the control system, the control system transmitting access information through the firewall in response to receiving the exercise start information to authorize the one or more client machines to access at least one device in the set of one or more required devices. --

--72. (New) The system of claim 67 wherein at least one of the devices in the set of one or more required devices is a network device, a router or a switch. --

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--73. (New) The system of claim 67 wherein the control system transfers reset information to at least one of the devices in the set of one or more required devices upon completing the training exercise to place the at least one device in an initial state. --

--74. (New) A method comprising:

receiving control information having at least one training instruction regarding at least one task to be performed as part of a training exercise;

managing one or more devices in the first set of one or more devices which are required to perform the training exercise;

directing a set of the one or more required devices to execute the at least one training instruction; and

reassigning at least one device from a second set of one or more devices to the set of the one or more required devices based upon requirements of the training exercise. --

--75. (New) The method of claim 74 further comprising enabling one or more client machines sending the control information to remotely access the set of the one or more required devices to perform the training exercise on the set of the one or more required devices. --

--76. (New) The method of claim 74 further comprising translating the received control information from a first network protocol to a second network protocol. --

--77. (New) The method of claim 74 further comprising:

receiving exercise start information reflecting a request from one or more client machines that the training exercise begin;

determining initialization information based upon the received exercise start information; and

initializing the set of the one or more required devices in accordance with the initialization information. --

--78. (New) The method of claim 77 further comprising transmitting access information through a firewall in response to receiving the exercise start information to

authorize the one or more client machines to access at least one device in the set of the one or more required devices. –

--79. (New) The method of claim 74 further comprising transmitting reset information to at least one device in the set of the one or more required devices upon completion of the training exercise to place the at least one device in an initial state. --

--80. (New) A computer-readable medium having stored thereon instructions, which when executed by at least one processor, causes the at least one processor to perform:

receiving control information having at least one training instruction regarding at least one task to be performed as part of a training exercise;

managing one or more devices in the first set of one or more devices which are required to perform the training exercise;

directing a set of the one or more required devices to execute the at least one training instruction; and

reassigning at least one device from a second set of one or more devices to the set of the one or more required devices based upon requirements of the training exercise. --

--81. (New) The medium of claim 80 further comprising enabling one or more client machines sending the control information to remotely access the set of the one or more required devices to perform the training exercise on the set of the one or more required devices. --

--82. (New) The medium of claim 80 further comprising translating the received control information from a first network protocol to a second network protocol. --

--83. (New) The medium of claim 80 further comprising:

receiving exercise start information reflecting a request from one or more client machines that the training exercise begin;

determining initialization information based upon the received exercise start information; and

initializing the set of the one or more required devices in accordance with the initialization information. –

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--84. (New) The medium of claim 83 further comprising transmitting access information through a firewall in response to receiving the exercise start information to authorize one or more client machines to access at least one device in the set of the one or more required devices. --

--85. (New) The medium of claim 80 further comprising transmitting reset information to at least one device in the set of the one or more required devices upon completion of the training exercise to place the at least one device in an initial state. --